

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JENNIFER ECKHART and CATHY AREU,	:
	:
Plaintiffs,	:
	:
against	:
	:
FOX NEWS NETWORK, LLC, ED HENRY,	:
SEAN HANNITY, TUCKER CARLSON and	:
HOWARD KURTZ, in their individual and	:
professional capacities,	:
	:
Defendants.	
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Civil Case No. 1:20-cv-05593

**AFFIDAVIT OF DEBORAH STEELE IN SUPPORT OF
DEFENDANTS' RULE 11 MOTION FOR SANCTIONS**

I, Deborah Steele, affirm the following to be true under penalty of perjury pursuant to 28 U.S.C. § 1746 and Local Civil Rule 1.9:

1. I have been employed with Fox News Network, LLC ("Fox News") since 1996 and am currently the Vice President of Information Technology and Cybersecurity. I have been in that role since July 2017. I am fully familiar with the facts and circumstances set forth herein and make this Affidavit in Support of Defendants' Rule 11 Motion for Sanctions.
2. Exhibit A is a true and correct copy of the July 1, 2020 email from Plaintiff Cathy Areu to Amy Sohnen, Senior Vice President of Talent Development at Fox News, regarding Ed Henry.
3. Exhibit B is a true and correct copy of the July 20, 2020 email from a reporter to Irena Briganti, Senior Executive Vice President, Corporate Communications, Fox News/Fox

Business, forwarding a press release issued by Plaintiff Cathy Areu's counsel, Wigdor LLP. I have been advised that sensitive or privileged information has been redacted pursuant to Federal Rule of Civil Procedure 5.2.

4. Exhibit C is a true and correct copy of a series of emails dated March 8, 2018 to March 9, 2018 between Cathy Areu and a *Hannity* staffer about Ms. Areu's upcoming appearance on *Hannity*. I have been advised that sensitive or privileged information has been redacted pursuant to Federal Rule of Civil Procedure 5.2.

Dated: 8/25/20

By: Deborah Steele
Deborah Steele